

MEMORANDUM

Water Division

Department of Environmental Quality

SUBJECT: Guidance Memo No. 02-2006
VPDES-VPA Inspection Strategy

TO: Regional Directors

FROM: Larry G. Lawson, P.E.

DATE: May 6, 2002

COPIES: Martin Ferguson, OWPP Staff , Regional Compliance and Enforcement Managers,
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Summary:

Attached is the VPDES-VPA Inspection Strategy that replaces Guidance Memo No. 90-2000 dated September 16, 1998. This VPDES-VPA Inspection Strategy contains changes that will significantly affect how DEQ water inspectors schedule their activities. Major VPDES facilities have had their inspection frequency reduced from annual to biennial to free up staff time for inspection of facilities covered by stormwater general permits. The changes were made in response to changing priorities from EPA.

Contact Information:

Thanks to the regional staff who contributed to the revision of this document. If there are any questions about the strategy, please contact Bill Purcell at 804-698-4048.

DISCLAIMER

This document provides procedural guidance to the compliance staff. This document is guidance only. It does not establish or affect legal rights or obligations. It does not establish binding norm and is not finally determinative of the issues addressed. Agency decisions in any particular case will be made by applying the State Water Control Law and the implementation regulations on the basis of the site specific facts.

DEPARTMENT OF ENVIRONMENTAL QUALITY

VPDES - VPA

INSPECTION STRATEGY

APRIL 2002

I. Introduction

The Department of Environmental Quality (DEQ) Virginia Pollutant Discharge Elimination System (VPDES) Permit program, the Pretreatment program, the Virginia Pollution Abatement (VPA) Permit program, and the VPDES and VPA general permit program rely primarily on the concept of permittee self-compliance monitoring and reporting. To insure that the self-monitoring information is representative and accurate and that the treatment facilities are properly operated and maintained, the DEQ conducts facility inspections as the principal form of regulatory surveillance.

The purpose of this document is to set forth the VPDES - VPA inspection strategy for the DEQ. This strategy identifies inspection authorities, objectives, types, frequencies, scheduling, and reporting.

II. Strategy Goals

The major goals of this strategy are:

1. to provide a framework for compliance and to assure optimum coverage and thoroughness inspection activities of the regulated community;
2. to assure that obligations under the State Water Control Law and federal grant agreements are met;
3. to provide guidance and assistance for operating plan commitments, budgeting, and resource requirements;
4. and to provide a framework to ensure inspections are conducted in a consistent manner.

III. Inspection Authority

The DEQ's authority to conduct inspections is provided for in the State Water Control Law ("Law") and the Permit Regulation.

§62.1-44.13 of the Law states:

"The Board shall make such inspections, conduct such investigations and do such other things as are necessary to carry out the provisions of this chapter, within the limits of appropriation, funds, or personnel which are, or become, available from any source for this purpose."

§62.1-44.15(5a) of the Law states:

"...The Department of Environmental Quality shall inspect all facilities for which a Virginia Pollution Abatement permit has been issued at least once every five years, except that the Department shall inspect all facilities covered by the Virginia Pollution Abatement permit for confined animal feeding operations annually. Department personnel performing inspections of confined animal feeding operations shall be certified under voluntary nutrient management in §10.1-104.2."

§62.1-44.15(6) of the Law states;

"To make investigations and inspections, to ensure compliance with any certificates, standards, policies, rules, regulations, rulings and special orders which may adopt, issue or establish and to furnish advice, recommendations, or instructions for the purpose of obtaining such compliance. In recognition of §§32.1-164 and 62.1-44.18, the Board and the State Department of Health shall enter into a memorandum of understanding establishing a common format to consolidate and simplify inspections."

§62.1-44.20 of the Law states:

"Any duly authorized agent of the Board may, at reasonable times and under reasonable circumstances, enter any establishment or upon any property, public or private, for the purpose of obtaining information or conducting surveys or investigations necessary in the enforcement of the provisions of this chapter."

§62.1-44.21 of the Law states:

"The Board may require every owner to furnish when requested such plans, specifications, and other pertinent information as may be necessary to determine the effect of the wastes from his discharge on the quality of State waters, or such other information as may be necessary to accomplish the purpose of this chapter."

§62.1-44.19:15 B(7) of the Law states:

"Monitoring shall be conducted so that it: Utilizes announced and unannounced inspections, and collection and testing of samples from establishments discharging to state waters."

§9VAC 25-31-190.I Inspection and Entry of the VPDES Permit Regulation and §9VAC 25-32-80.F of the VPA Permit Regulation states:

"Upon presentation of credentials, any duly authorized agent of the Board may, at reasonable times and under reasonable circumstances,

1. Enter upon the permittee's property, public or private and have access to records required by the permit,
2. Have access to, inspect and copy any records that must be kept as part of permit conditions,
3. Inspect any facility's equipment (including monitoring and control equipment) practices or operations regulated or required under the permit,
4. Sample or monitor any substances or parameters at any locations for the purpose of assuring permit compliance or as otherwise authorized by Law.

IV. Objectives of Inspection Program

The objectives of the inspection program are as follows:

1. to assure that facilities are in compliance with statutes, regulations, and requirements,
2. to improve facility performance by providing advice and assistance,
3. to support permit development,
4. to maintain a regulatory presence as an act of deterrence,
5. to support administrative, civil, and criminal enforcement actions,

6. to support development and implementation of the pretreatment program.

Each inspection of a wastewater treatment facility will not accomplish every objective, but most inspections are useful in accomplishing several rather than only one of the above objectives. Therefore, inspection activities are scheduled and implemented to provide maximum coverage of the facility with available DEQ resources. Inspections are initiated by staff as a scheduled or unscheduled activity or are in response to complaints or requests from outside DEQ.

V. Inspection Types

The DEQ water inspection staff performs four basic inspection types: (1) VPDES permit, (2) VPA permit, (3) compliance and (4) pretreatment. The types of inspections and their purposes are listed below. Unless otherwise noted, the DEQ regional water inspection staff conducts all inspections. A facility registered under a general permit should be given the same consideration for scheduling and inspection as facilities covered by an individual permit. It is the DEQ's goal to conduct inspections unannounced with few exceptions. Inspections may be announced at sites where security restrictions require such action, but should not be announced simply for the convenience of staff or facility personnel. For programmatic reasons confined animal feeding operations (CAFO) inspections are announced. Inspections are to be documented by report or memorandum as required by agency regulations and procedures. Compliance issues discovered during the inspections are summarized in this documentation. In addition to the forms and memoranda written to document inspection findings, including digital images in the report is an excellent mechanism to clarify inspection findings.

1. VPDES Permit Inspections

This inspection includes on-site evaluations of facilities that are regulated by individual and general VPDES permits. VPDES permit inspections consist of the following four subtypes: (a) technical, (b) laboratory, (c) sampling and (d) storage and land application of municipal biosolids.

a. VPDES Technical Inspection

This inspection involves a complete and detailed evaluation of the operation and maintenance of the wastewater treatment process and/or sludge treatment facility as well as a cursory evaluation of the facility record keeping, sampling, laboratory testing procedures and implementation of the pretreatment program. Inspection of collection systems is a routine portion of technical inspections. This would include the inspection of the 3 combined sewers still operating in the state. Technical inspections are documented on the VDH (Virginia Department of Health)-DEQ Wastewater Facility Inspection Report which consists of three parts: Preface, Part I, and Part II. The technical inspection report forms are located in <http://www.deq.state.va.us/forms/checklist.html>. For small facilities (as defined in the Inspection Frequency Table), the inspector may complete portions of the VDH-DEQ form or may write a memorandum. This report form is a combination of "checklist" and "fill-in-the-blanks" type format that allows for relatively rapid completion while at the same time providing

space for detailed comments. The form is designed to guide the inspector as to what to look for during an inspection. Through completion of the report, operational problems or possible violations should be noted and recommendations for action developed. The VPDES technical inspections are performed in accordance with the Instructions for Completion of VDH/DEQ Wastewater Facility Inspection Report. By design the forms can be handwritten and completed in the field. Inclusion of digital images, as appropriate, with the inspection report can be useful to document the conditions found.

The purpose of this type of inspection is to document the overall performance of the treatment facility. Reports are to be completed and mailed to the appropriate parties, within 30 calendar days of the inspection. The regional offices are responsible for initiating follow-up corrective actions for inspection deficiencies found. The minimum frequency for performing technical inspections is dependent upon the classification of the facility as noted in the Inspection Frequency Table, located at the end of this document.

Inspection of a stormwater permitted facility can be broken down into three components; (1) the review of the Stormwater Pollution Prevention Plan (SWPPP), (2) review of the SWPPP required record keeping and (3) the site inspection. Each segment of the inspection is important, however emphasis should be placed on walking the site and observing how the SWPPP has been implemented and noting any potential or actual problem areas.

During an inspection it should be determined if a valid SWPPP exists. Existing industrial facilities (non-construction) should have the SWPPP developed and implemented 270 days after permit issuance. New facilities should have the SWPPP developed and implemented prior to the facility applying for the storm water permit. The SWPPP should contain the following major items:

1. Identities of the pollution prevention team who are responsible for developing, implementing, maintaining and revising the pollution prevention plan.
2. A description of the potential sources of pollutants that are expected to add significant amounts of pollutants to storm water discharges.
3. A site map showing the drainage area and any structural control measures and locations of significant materials exposed to precipitation.
4. An inventory of the types of materials handled at the site that may potentially be exposed to precipitation.
5. A description of storm water management controls for the facility, including an implementation schedule. Management controls would include but not be limited to housekeeping procedures, preventive maintenance, spill prevention and response procedures, routine inspections, employee training, and record keeping procedures.

6. In areas where there is a potential for storm water to mix with section 313 priority chemicals, appropriate measures to prevent contact with storm water shall be present. Such measures may include diversionary structures, curbing, gutters, roofing and secondary containment.

In addition to the generic SWPPP requirements, facilities may need to address SWPPP items that are specific to the industrial sectors that occur at the facility. Refer to the VPDES Permit Manual for the specific SWPPP requirements.

For construction site general permits, the SWPPP should be in place and the site in compliance with the terms of the plan *prior* to the commencement of construction. An erosion and sediment control plan (E&S plan) that is approved by state or local officials may be used to satisfy the requirements of the permit for the development of a SWPPP provided the E&S plan satisfy all of the requirements of the SWPPP. The construction site SWPPP is primarily concerned with erosion and sediment controls and shall contain the following items:

1. A description of the pollutant sources and other site information.
2. A description of appropriate controls and measures that will be implemented at the construction site, to include: (a) erosion and sediment controls (stabilization and structural practices), (b) storm water management and (c) other controls.
3. A description and schedule of procedures to maintain in good and effective operating condition any vegetation, and E&S control measures, or other protective measures during construction at the site.
4. Facility personnel shall inspect disturbed areas at the site that have been finally stabilized and areas used for storage of materials that are exposed to precipitation, structural control measures, and locations where vehicles enter and exit the site.
5. Non-stormwater discharges, with the exception of fire fighting flows, must be identified in the plan.
6. The SWPPP must clearly identify the contractors and subcontractors that will implement each measure detailed in the plan.

During the site inspection of a permitted stormwater facility, record keeping specified in the permit and SWPPP should be given a cursory examination, with more thorough review as necessary. A record keeping system should be in place that documents all required activities contained in the SWPPP.

The primary focus of inspecting a permitted storm water facility should be walking the plant or construction site to evaluate the effectiveness of the control measures implemented. Taking photographs during this phase of the inspection would be highly beneficial. Photographs can be integrated into the inspection report providing an excellent record of the conditions

encountered during the inspection. It is important to view the entire site paying close attention to areas where materials are stored and any control measures.

Documentation of an inspection can be accomplished by using a combination of existing DEQ forms and descriptive memoranda as deemed appropriate by the region. Failure to follow provisions of the SWPPP should be documented in the report. Photographs included with the inspection report serve as excellent supplemental documentation of the conditions encountered. The routine use of digital photography is strongly encouraged. Any concerns that an inspector may have about the adequacy of an SWPPP should be brought to the attention of the regional permit staff. Storm water inspections are entered into CEDS using the existing screens in the water inspection module.

b. VPDES Laboratory Inspection

The VPDES laboratory inspection is a comprehensive review of the permittee's laboratory sampling, analytical, and record keeping procedures. During a VPDES laboratory inspection the inspector evaluates the procedures used by the permittee for discharge monitoring from sample collection and flow measurement through laboratory analyses, data work-up, and DMR reporting.

The purpose of this inspection is to determine whether the facility's self-monitoring procedures can be expected to produce results that are representative of the quality and nature of the permitted discharge. This is accomplished by reviewing analytical, record keeping and reporting procedures. Laboratory inspections are performed by regional inspectors at facilities with self-monitoring requirements.

Laboratory inspections are performed in accordance with the DEQ - Water Division Standard Operating Procedures for Laboratory Inspections. Laboratory inspections are documented on laboratory inspection report forms and check sheets. Completed reports are distributed within 30 calendar days of the site visit. These forms are located <http://www.deq.state.va.us/forms/checklist.html> and are designed to be handwritten and completed onsite. Laboratories are no longer rated as satisfactory, satisfactory with qualifications, or unsatisfactory. Any deficiencies that are found during the inspection are listed on the cover page of the inspection report. Laboratories are given 15 days from the receipt of their inspection report to correct any deficiencies found and notify the regional office of the corrections.

Laboratory inspections should be conducted at the same frequency as technical inspections. VPDES laboratory inspections are frequently performed on the same day as the technical inspections, however with large laboratories, multi-day inspections may be necessary. Teams of inspectors may also be employed to conduct laboratory inspections in order to complete the onsite portion of the inspection more quickly.

Stormwater general permits monitoring requirements are subject to the same regulations as other VPDES testing. Therefore the inspector can review monitoring data for compliance

with 40CFR136 and other relevant regulations. DEQ laboratory inspection forms and checksheets can be used to document how monitoring and analysis is conducted.

c. VPDES Sampling Inspection

All samples collected for VPDES/VPA permitted activities must be collected as a legal sample as described in Guidance Memo. No. 00-2016 - Chain of Custody Policy and Procedures. Since the results of legal surveys may be presented as evidence in court, it is vital that all chain of custody procedures are followed, field logbooks are completed and that samples are properly collected and preserved. Quality control/quality assurance samples, such as trip blanks and duplicate samples should also be considered to assist in validating sample results. Because of the duration of the sampling event and other factors, it is generally not possible to make direct comparisons of the sampling results and effluent limitations. In any case, no such comparison should be made without careful consideration. Splitting samples with the permittee is to be encouraged because of the insight it provides as to the reliability of reported data. An option available to DEQ staff collecting samples, is to use a portion of the sample the permittee has collected for reporting purposes, provided there is sufficient sample volume collected to split.

Typically a sampling inspection would include collecting samples for all reported parameters for a given permittee. This is not to say that there might be instances when specific parameters of interest would be all that were sampled for during a sampling inspection. Field parameters (pH, D.O., TRC) should be collected for all sampling inspections and recorded in the field logbook. Field parameters alone would not constitute a sampling inspection.

Care must be taken to properly complete the lab sheets that accompany samples. Samples must be collected, preserved, and analyzed as specified in 40 CFR 136. Questions regarding scheduling sample analysis with Division of Consolidated Laboratory Services (DCLS) should be made with the Laboratory Liaison in Water Quality Assessments. Samples with short holding times should not be collected on Fridays because they will not be set up until the following Monday.

The results of the sampling inspections are documented on the DEQ VPDES Sampling Inspection Report form. Sampling results from DCLS should be available in CEDS within 21 days. Late analyses and other problems should be brought to the attention of the Laboratory Liaison in WQA. Sampling reports should be completed and distributed within 30 calendar days from receipt of the results. Analytical results of the survey are included with the Sampling Inspection Report form. Do not distribute the Sampling Inspection Report form without the results. Sampling inspections should be conducted at least once every five years for VPDES facilities. Facilities with compliance problems or facilities with a high potential for environmental harm, should be prioritized.

The regional office may elect to schedule sampling inspections along with other VPDES inspections or to conduct discrete sampling inspections. Alternatively, sampling inspections may be performed by ambient monitoring staff while conducting field work in the area. Field inspection staff should be prepared to collect samples to document conditions encountered. Due to the intermittent nature of storm water discharges, facilities covered by storm water general

permits will be sampled at regional discretion. This flexibility is designed to enable the regional office the ability to fulfill the strategy with minimal staff impacts.

d. Land Application of Municipal Biosolids

Municipal VPDES permits utilizing land application of biosolids should be inspected for compliance with their sludge management plans (SMP). Inspection of all VPDES permit holders should be verifying compliance with the facility SMP. At least equally important in land application operations is compliance with 40 CFR 503, Part VI of the VPDES Permit Regulation, special permit conditions and reporting conditions. Land application sites and the associated records should be audited at the same frequency as specified for the VPDES facility generating the biosolids. The inspection of biosolids land application sites is documented on the form entitled: Land Application of Sludge. VPDES facilities that contract out land application of biosolids are still required to monitor biosolids quality. Biosolids testing records and storage facilities should also be reviewed during this inspection activity.

2. VPA Inspections

This inspection involves on-site evaluations of facilities designed not to discharge to surface waters and involves (a) confined animal feeding operations (including poultry operations), (b) land application of industrial sludge, and (c) other VPA facility inspections.

a. Confined Animal Feeding Operations (CAFO) Inspection

This inspection involves an evaluation of animal feeding operations, including waste treatment, handling and disposal. Effective July 1, 1998, all CAFO facilities are to be inspected annually by inspectors certified under the Department of Conservation and Recreation's nutrient management program. To comply with the law, a certified Nutrient Management Planner must perform the annual inspection. Follow up activity can be directed by a certified inspector and conducted by other agency personnel. CAFOs are to be inspected annually and the inspections are documented on the CAFO inspection form that is located at <http://www.deq.state.va.us/forms/checklist.html>. CAFO inspections are the only inspection type that is routinely announced.

b. Land Application of Industrial Sludge

This inspection involves on-site observation of industrial sludge land application sites to verify compliance with permit requirement. The inspection of a sludge land application site is documented on the form entitled: Land Application of Sludge and soil testing records should be examined as part of the inspection.

c. Other VPA Inspections

Other VPA inspections encompass a wide variety of operations, from wood preserving plants to municipal treatment works that land apply treated wastewater. Since these facilities are specific in their design and operation there may be no existing reporting forms. If no forms exist

to document the inspection a memorandum that sets forth the date, purpose of the inspection, inspection findings, and recommendations can be used.

c. VPA Laboratory Inspections

VPA laboratory inspections are conducted the same way VPDES laboratory inspections are with the exception that very little if any testing is done onsite. Therefore the inspection would entail primarily records review. The CAFO inspection form already covers much of what would be evaluated during a lab inspection. Many VPA permits have monitoring requirements and it is important that reported analyses are representative of the conditions encountered. The frequency of VPA laboratory inspections is not specified. It is recommended that a laboratory inspection be conducted with each routine technical inspection of the facility. Most inspections will be limited to a review of record keeping and sample reservation procedures, since the majority of samples are sent to commercial and central laboratories.

3. Compliance Inspections

This inspection is an evaluation of the wastewater treatment and/or sludge facility which is generally conducted as a result of significant violations of a Board issued permit, Board regulations, previous enforcement action, or state/federal statutes and accompanies the issuance/delivery of a DEQ Notice of Violation (NOV). Documentation of this type of inspection is done by memorandum and / or the Compliance Inspection report form. A compliance inspection may also be conducted as a follow-up activity to the mailing of a Warning Letter (WL). The purpose of this inspection is to focus attention on the cause(s) of violations, determine whether correction of previous deficiencies has been accomplished, and to note noncompliance found during the inspection.

4. Pretreatment Inspections

DEQ Pretreatment Inspectors perform two types of pretreatment inspections:

a. POTW Audits

POTW's with fully approved pretreatment programs are audited annually. Developing programs and conditionally approved programs are not audited. The audits are designed to provide a comprehensive review of a POTW's approved program. The auditor must be familiar enough with all aspects of a local pretreatment program to conduct an audit that will collect the data necessary to make a meaningful evaluation of the POTW's compliance status and the effectiveness of the program in achieving its goals. Audits are documented on check sheets that can be found in the Pretreatment Manual. Completed check sheets are sent to CO, and the POTW.

b. Industrial User (IU) Inspections

Two types of IU's are inspected, categorical IU's and significant IU's. A categorical IU is defined as an IU that is subject to a categorical standard promulgated by

EPA. A significant IU is defined as an IU that is either a categorical IU; or a user that discharges an average of 25,000 gpd or more of process wastewater to a POTW; or contributes a process waste stream that makes up 5% or more of the average dry weather hydraulic or organic capacity; or is designated as significant by the POTW. Categorical IU's in fully approved programs are inspected once every two years. Categorical IU's in developing or conditionally approved programs are inspected annually. Significant non-categorical IU's are inspected in fully approved programs once every five years. Inspections are documented on check sheets that can be found in the Pretreatment Manual. Copies of the inspection report are sent to the IU. DEQ inspectors do not inspect significant, non-categorical IU's in developing or conditionally approved programs.

5. Other Inspections

The DEQ performs other types of inspections designed to assist the permittees, to investigate complaints, and to follow-up on previous inspections.

a. Assistance Inspections

This is a specific inspection scheduled either as a request for assistance from the facility owner or operator or from staff initiative. Documentation of this type of inspection is flexible. Inspector can use any appropriate DEQ form or memorandum to document the inspection.

b. Diagnostic Evaluations

Diagnostic Evaluations involve an intensive evaluation of all aspects of the treatment facility and are the longest and most rigorous of all inspections. These evaluations are performed by the Office of Operator Training - Wastewater Treatment Program with assistance from the regional offices. Identification and scheduling of facilities that could benefit from this evaluation is achieved through prioritizing facilities according to established criteria and focuses on POTW's less than 1.0 mgd that are having compliance problems. The purpose of the diagnostic evaluation can be either to assist those POTW's without self-diagnostic capability or to evaluate causes for non-compliance in support of enforcement actions. A comprehensive report documenting on-site activities, computer diagnostic model results, and the conclusions is prepared. The training staff develops a training and assistance plan that addresses identified performance limiting factors. Before the plan is implemented facility management must buy into it and support the onsite activities. In those cases where the problems can not be addressed by training and assistance (i.e. design deficiencies, severe I/I, etc.) recommendations made are to obtain the assistance of a qualified professional to develop a plan of action.

c. Unscheduled Inspections

An unscheduled inspection is an inspection that does not appear on the annual inspection schedule. This inspection type is useful to observe facilities that have had a history of noncompliance or as a result of a complaint. However; this inspection type should not be limited to "problem" facilities. Regions should also randomly select facilities for inspection without regard to compliance history or facility size. Unscheduled inspections are unannounced, and can be conducted when an inspector is "in the area" with other duties. These inspections are performed to supplement the regularly scheduled inspections to provide an additional regulatory presence. As an agency goal, unscheduled inspections should comprise approximately 10% of the total number of technical inspections conducted. If problems are observed the inspector should be prepared to document conditions observed with photographs, samples, and field parameters. Written documentation of the inspection may be in the form of a memorandum or the inspector may use established DEQ report forms.

d. Sanitary Sewer Overflow (SSO) Inspections

The occurrence of SSOs is dependent on factors such as precipitation events, mechanical failures, collection system blockage and vandalism. Scheduling manpower for events is difficult because of the unpredictability of the occurrences. When an overflow occurs it is generally logged into the Prep database. Spill clean up and receipt of the five-day letter is tracked in the database until resolution. If a citizen reports an overflow, the responsible party is notified and a five-day letter is requested. The Virginia Department of Health is notified of the overflow by email. An investigation is generally conducted if there has been (1) a fish kill, (2) a request from upper management, (3) media or public attention, (4) no contact with the responsible party or (5) apparent negligence.

VI. Commercial Laboratory Inspections

Commercial laboratory inspections involve essentially the same procedures and inspection forms as those used in evaluating permittee operated laboratories. Authority to inspect commercial laboratories is indirect since these facilities do not hold permits or certificates issued by DEQ. The Office of the Attorney General confirmed this opinion in writing. Procedures to inspect commercial laboratories are contained in the Standard Operating Procedures for Laboratory Inspections and amended in the Guidance Memo. No. 01-2006.

Inspection frequency for commercial laboratories is listed in the attached table. Inspection of out of state laboratories is at the discretion of the region. Assistance evaluating metals and organics analysis is available from Elizabeth Ziomek, DMRQA Coordinator. Check sheets for organics and metals analysis are contained in <http://www.deq.state.va.us/forms/checklist.html>. Inspectors familiar with metals and or organics analyses are encouraged to use the check sheets to evaluate laboratory procedures.

VII. Inspection Frequency

State law establishes inspection frequency, as well as agreements with US EPA and agency priorities. The minimum frequency goals for the DEQ to perform VPDES permit inspections (technical and laboratory), VPA inspections and commercial laboratory inspections are presented in the Inspection Frequency Table at the end of this document. Other inspections discussed in this strategy are conducted on an as needed basis.

VIII. Inspection Reporting

One copy of all inspection reports from permitted facilities are sent, with the exception of the compliance inspection reports, to the Inspections Coordinator in the Office of Water Permit Programs (OWPP) within 30 calendar days of the inspection date. It is not necessary to copy the Inspections Coordinator with compliance inspection reports. Send reports to the Inspections Coordinator once or twice per month. The regional office should retain originals of all inspection reports, with a copy sent to the facility inspected. A copy of all inspection reports of sewage treatment works should be sent to the VDH in Richmond. The Inspections Coordinator will forward a copy of major VPDES and federal facility permits inspection reports to EPA. The Inspections Coordinator will also prepare quarterly and annual inspection summaries for distribution within the agency and to EPA.

IX. Inspection Scheduling

VPDES permit (technical, laboratory, and sampling) and the VPA permit inspections must be scheduled in advance on a yearly basis and should conform to the minimum goals set forth in the Inspection Frequency Table. Schedules must be forwarded to the Inspections Coordinator by May 15th each year. At a minimum the schedule should contain, facility name, permit number, facility type (e.g. municipal major, industrial minor, etc.), and inspection month and year. It is helpful to have the schedule sorted by month so that the schedule reads from July through June of the fiscal year. Inspection schedules should be rotated to fall at different times of the year, rather than recycle inspection schedules year after year. Rotating the schedule will allow facilities to be observed under changing operating conditions, and avoid being predictable. An excellent tool for prioritizing inspections is DMRQA results. Permittees and commercial laboratories performing poorly on the DMRQA results should be moved up in the inspection schedule if they have been scheduled toward the end of the fiscal year. Report all schedule changes to the Inspection Coordinator.

Coordination of inspections with the VDH is no longer necessary, since the VDH is not conducting routine inspection. However, inspection schedules should be sent to the appropriate VDH regional offices for their information. All other inspections do not need to be scheduled in advance. Inspection of single family homes should be deferred to the Local Health Department, unless the discharge is into protected or prohibited waters where dechlorination may be required.

It may be necessary to prioritize inspection of facilities and sites covered by stormwater general permits because of insufficient manpower to inspect all permitted activities. Industrial

stormwater general permitted facilities with monitoring should be targeted for inspection and facilities with only stormwater pollution prevention plans (SWPPP) will only be inspected if time permits or circumstance dictate. The region should prioritize the largest construction sites covered by the stormwater construction general permit for inspection.

INSPECTION FREQUENCY TABLE			
	Annually	Biennially	5 years
Inspection Type			
VPDES Municipal Major (≥ 1.0 mgd)		X	
VPDES Municipal Minor (≥ 0.04 & ≤ 1.0 mgd)		X	
VPDES Municipal Small (≥ 0.001 & ≤ 0.04 mgd)			X
VPDES Industrial Major (DEQ/EPA majors list)		X	
VPDES Industrial Minor (not a major or small)		X	
VPDES General			X
VPDES Industrial Small*			X
VPDES Sampling**			X
VPG (CAFO)	X		
VPA (High Priority)***	X		
VPA (Low Priority)****			X
Commercial Laboratory (Major)*****	X		
Commercial Laboratory (Minor)****		X	

*Small is considered to be an industrial facility with low environmental impact potential such as discharges of non-contact cooling water, sand and gravel operations, car washes, etc.

**Sampling inspections will be conducted subject to the availability of effluent

***High priority is assigned to facilities with high environmental impact potential or high public concern and includes animal feeding operations, wood preserving operations, sludge disposal activities, and other facilities so classified by the Regional Offices. An inspection of sludge

disposal permitted facilities includes, as a minimum, an inspection of the storage facilities and at least one land application site per permitted facility per year.

****Minor Commercial Laboratory designation is assigned to all other facilities not considered as high priority.

*****Major Commercial Laboratories are those who serve ten or more minor VPDES/VPA permittees and/or 1 major facility.